

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1, HUGH "Harold" LUSK,  
D-2, CURTIS HANSEND,  
D-3, ROBERT "Unc" HILL,  
D-4, JONATHAN RULAND,  
D-5, AMY CHAPMAN,  
D-6, KIRK METRO,

Defendants.

Case: 2:21-cr-20307  
Judge: Tarnow, Arthur J.  
MJ: Altman, Kimberly G.  
Filed: 05-05-2021 At 08:15 AM  
INDI USA V. SEALED MATTER (DA)

VIO: 21 U.S.C. § 841(a)(1)  
21 U.S.C. § 846  
18 U.S.C. § 922(g)(1)

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**INDICTMENT**

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THE GRAND JURY CHARGES:

**COUNT ONE**

(21 U.S.C. §§ 846 and 841(a)(1) - Conspiracy to Possess with  
Intent to Distribute and Distribute a Controlled Substance)

D-1, HUGH "Harold" LUSK  
D-2, CURTIS HANSEND  
D-3, ROBERT "Unc" HILL  
D-4, JONATHAN RULAND  
D-5, AMY CHAPMAN  
D-6, KIRK METRO

As early as in or about August 2016, and continuing through at least on or  
about February 15, 2017, in the Eastern District of Michigan, Southern Division,

and elsewhere, Defendants HUGH “Harold” LUSK, CURTIS HANSEND, ROBERT “Unc” HILL, JONATHAN RULAND, AMY CHAPMAN and KIRK METRO, together with others known and unknown to the grand jury, did knowingly, intentionally, and unlawfully, conspire to commit an offense against the United States, that is, to possess with the intent to distribute, and to distribute, a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

**COUNT TWO**

(21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance  
Resulting in Death; 18 U.S.C. § 2 – Aiding and Abetting)

D-6, KIRK METRO

On or about September 22, 2016, in the Eastern District of Michigan, Southern Division, KIRK METRO and others, aided and abetted by one another, did knowingly, intentionally, and unlawfully, distribute a controlled substance. Specifically, METRO and those other individuals knowingly, intentionally, and unlawfully, distributed a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanimide, “fentanyl,” which is a schedule II controlled substance, and Victim AV-1 died as a result of using the substance

METRO and those other individuals distributed, all in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

**COUNT THREE**

(21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute a Controlled Substance)

D-3, ROBERT “UNC” HILL  
D-5, AMY CHAPMAN

On or about January 27, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “Unc” HILL and AMY CHAPMAN did knowingly, intentionally, and unlawfully, possess with the intent to distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOUR**

(21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance;  
18 U.S.C. § 2 – Aiding and Abetting)

D-3, ROBERT “UNC” HILL  
D-5, AMY CHAPMAN

On or about January 27, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “Unc” HILL and AMY CHAPMAN, aided and abetted by one another, did knowingly, intentionally, and unlawfully, distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-

[1-(2-phenylethyl)-4-piperidiny] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FIVE**

(21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute a Controlled Substance)

D-3, ROBERT “UNC” HILL  
D-5, AMY CHAPMAN

On or about February 3, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “Unc” HILL and AMY CHAPMAN did knowingly, intentionally, and unlawfully, possess with the intent to distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT SIX**

(21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance;  
18 U.S.C. § 2 – Aiding and Abetting)

D-3, ROBERT “UNC” HILL  
D-5, AMY CHAPMAN

On or about February 3, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “Unc” HILL and AMY CHAPMAN, aided and abetted by one another, did knowingly, intentionally, and unlawfully, distribute a controlled

substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT SEVEN**

(21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute a Controlled Substance)

D-3, ROBERT “UNC” HILL  
D-5, AMY CHAPMAN

On or about February 7, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “Unc” HILL and AMY CHAPMAN did knowingly, intentionally, and unlawfully, possess with the intent to distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT EIGHT**

(21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance;  
18 U.S.C. § 2 – Aiding and Abetting)

D-3, ROBERT “UNC” HILL  
D-5, AMY CHAPMAN

On or about February 7, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “Unc” HILL and AMY CHAPMAN, aided and abetted by one

another, did knowingly, intentionally, and unlawfully, distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT NINE**

(21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute a Controlled Substance)

D-4, JONATHAN RULAND  
D-5, AMY CHAPMAN

On or about February 10, 2017, in the Eastern District of Michigan, Southern Division, JONATHAN RULAND and AMY CHAPMAN did knowingly, intentionally, and unlawfully, possess with the intent to distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TEN**

(21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance;  
18 U.S.C. § 2 – Aiding and Abetting)

D-4, JONATHAN RULAND  
D-5, AMY CHAPMAN

On or about February 10, 2017, in the Eastern District of Michigan, Southern Division, JONATHAN RULAND and AMY CHAPMAN, aided and abetted by one another, did knowingly, intentionally, and unlawfully, distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT ELEVEN**

(21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute a Controlled Substance)

D-3, ROBERT “UNC” HILL  
D-5, AMY CHAPMAN

On or about February 13, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “Unc” HILL and AMY CHAPMAN did knowingly, intentionally, and unlawfully, possess with the intent to distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWELVE**

(21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance;  
18 U.S.C. § 2 – Aiding and Abetting)

D-3, ROBERT “UNC” HILL  
D-5, AMY CHAPMAN

On or about February 13, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “Unc” HILL and AMY CHAPMAN, aided and abetted by one another, did knowingly, intentionally, and unlawfully, distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THIRTEEN**

(21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute a Controlled Substance)

D-4, JONATHAN RULAND

On or about February 14, 2017, in the Eastern District of Michigan, Southern Division, JONATHAN RULAND did knowingly, intentionally, and unlawfully, possess with the intent to distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II



controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOURTEEN**

(21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute a Controlled Substance)

D-2, CURTIS HANSEND

On or about February 15, 2017, in the Eastern District of Michigan, Southern Division, CURTIS HANSEND did knowingly, intentionally, and unlawfully, possess with the intent to distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FIFTEEN**

(18 U.S.C. § 922(g)(1) & 924(a)(2) - Felon in Possession of Ammunition)

D-2, CURTIS HANSEND

On or about February 15, 2017, in the Eastern District of Michigan, Southern Division, CURTIS HANSEND, after having previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year (a felony offense), knowing that he had been so previously convicted, did knowingly and unlawfully possess ammunition, specifically,

- multiple Smith & Wesson 38-Special cartridges (50 rounds);

- multiple 16 Gauge Shotgun cartridges (49 rounds);
- one .32 Automatic Colt Pistol cartridge (1 round); and,
- one .45 Caliber cartridge (1 round),

with all of that ammunition having previously traveled in interstate and/or foreign commerce, all in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

**COUNT SIXTEEN**

(21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute a Controlled Substance)

D-3, ROBERT “UNC” HILL

On or about February 15, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “UNC” HILL did knowingly, intentionally, and unlawfully, possess with the intent to distribute a controlled substance, specifically, a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, also known as “fentanyl,” which is a schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT SEVENTEEN**

(18 U.S.C. § 922(g)(1) & 924(a)(2) - Felon in Possession of a Firearm)

D-3, ROBERT “UNC” HILL

On or about February 15, 2017, in the Eastern District of Michigan, Southern Division, ROBERT “UNC” HILL, after having previously been

convicted of at least one crime punishable by imprisonment for a term exceeding one year (a felony offense), knowing that he has been so previously convicted, did knowingly and unlawfully possess a firearm, that is, one loaded Colt Python .357 Magnum caliber revolver, with serial number E20762, said firearm having previously traveled in interstate and/or foreign commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

### **FORFEITURE ALLEGATIONS**

The allegations contained in Counts One through Nineteen of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of any of the offenses set forth in Counts Seventeen and Nineteen of this Indictment, Defendants CURTIS HANSEND and ROBERT “Unc” HILL shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in the knowing commission of the offense.

Further, pursuant to Fed.R.Cr.P. 32.2(a), the government hereby provides notice to the defendant(s) of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission

of the violations alleged, or property traceable thereto, and all property involved in,  
or property traceable thereto, of the violations set forth in this Indictment.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

SAIMA S. MOHSIN  
Acting United States Attorney

JULIE A. BECK  
Chief, Drug Task Force Unit

s/ Carl D. Gilmer-Hill  
CARL D. GILMER-HILL  
JIHAN WILLIAMS  
Assistant United States Attorneys

Dated: May 5, 2021

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number .
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>CDGH</i>

Case Title: USA v. Huge "Harold" Lusk, et al.

County where offense occurred : Washtenaw and Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: ]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### **Superseding Case Information**

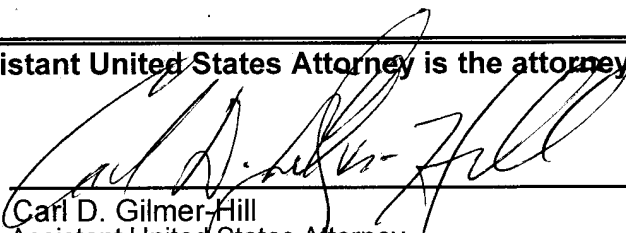
Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 5, 2021  
Date

  
 Carl D. Gilmer-Hill  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.